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*Attorney for Non-Party Sony Interactive Entertainment  
LLC*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IMPLICIT CONVERSIONS, INC.,

Plaintiff,

v.

JACOB STINE, an individual, JUANITA  
TRAVER STINE, an individual, PROJECT  
CRAYON LLC, a California Limited Liability  
Corporation, and DOES 1-10, inclusive,

Defendants.

JACOB STINE, an individual, JUANITA  
TRAVER STINE, an individual,

Counter-claimants,

v.

IMPLICIT CONVERSIONS, INC., a Delaware  
Corporation; and ROBIN LAVALLEE, an  
individual,

Counter-defendants.

Civil Action No. 3:24-cv-03744-WHO

**L.R. 79-5(f)(3) DECLARATION OF  
TIMOTHY LINDQUIST IN SUPPORT  
OF SEALING NON-PARTY SONY  
INTERACTIVE ENTERTAINMENT  
LLC'S CONFIDENTIAL  
INFORMATION**

Date: September 17, 2025

Time: 2:00 p.m.

Judge: Hon. William H. Orrick

1 I, Timothy Lindquist, declare as follows:

2 1. I am an employee of Sony Interactive Entertainment LLC (“SIE”). I have been  
3 employed by SIE since 2014. My current job title is Senior Manager. In this role, I lead SIE’s  
4 Classics team in its project to emulate classic game titles and render them playable on newer  
5 game systems offered by Sony. The Classics team is an important part of SIE’s overall business.  
6 As part of my role, I oversee SIE’s process for hiring vendors to work on the emulation project,  
7 including the decisions to hire Implicit Conversions Inc. and Project Crayon LLC. I also have  
8 personal knowledge about communications I had with SIE’s partners when issues arose of  
9 Implicit Conversions misusing intellectual property belonging to those partners.

10 2. I am generally aware that Implicit Conversions (“Implicit”) sued Jacob Stine,  
11 Juanita Traver Stine, and Project Crayon LLC (“Defendants”). I understand that SIE is not a party  
12 to this litigation and Implicit subpoenaed for deposition SIE, my colleague Jenny Murphy, and  
13 me. I was designated by SIE as its corporate witness to testify on its behalf in a Rule 30(b)(6)  
14 deposition and I also testified in my personal capacity. I am also generally aware that in its  
15 Opposition to Implicit’s Motion for Sanctions, Defendants cited to materials designated as  
16 confidential or attorneys’ eyes only. I submit this declaration in support of SIE’s request to keep  
17 certain of those materials sealed and to seal additional portions of the cited materials. I have  
18 personal knowledge of the content which SIE requests the Court to seal and can accurately and  
19 truthfully testify to the facts concerning the matters described in this declaration.

20 3. In support of its Opposition to the Motion for Sanctions, Defendants cited to, and  
21 attached as exhibits, transcript excerpts from my deposition and the deposition of Jenny Murphy  
22 both taken on August 6, 2025. Both transcripts contain confidential information. In the chart  
23 below I list the pages and lines of the transcripts.

| Source   | Page and Line | Explanation  |
|--|---------------|--|
| Ford Declaration at Ex. D<br>(Dkt. No. 113.1) Murphy<br>Dep. Tr. | 69:8-20       | Discusses confidential<br>communications with SIE’s<br>partners regarding misuse of<br>our partners’ intellectual<br>property. |

| Source  | Page and Line            | Explanation  |
|---|--------------------------|--|
| Ford Declaration at Ex. D (Dkt. No. 113.1) Murphy Dep. Tr.    | 70:2-22                  | Discusses internal SIE's procedures and business strategies regarding selecting and hiring vendors.  |
| Ford Declaration at Ex. E (Dkt. No. 113.1) Lindquist Dep. Tr. | 42:5-43:23               | Discusses confidential communications with SIE's partners regarding misuse of our partners' intellectual property.   |
| Ford Declaration at Ex. E (Dkt. No. 113.1) Lindquist Dep. Tr. | 47:3-48:14               | Discusses confidential communications with SIE's partners regarding misuse of our partners' and SIE's intellectual property.   |
| Ford Declaration at Ex. E (Dkt. No. 113.1) Lindquist Dep. Tr. | 96:18-97:7               | Discusses both confidential communications with SIE partners regarding misuse of our partners' intellectual property and internal SIE's procedures, policies, and strategy regarding selecting and hiring vendors. |
| Ford Declaration at Ex. E (Dkt. No. 113.1) Lindquist Dep. Tr. | 97:13-98:25              | Discusses confidential communications with SIE's partners regarding misuse of our partners' intellectual property.   |
| Opposition Brief (Dkt. No. 113)                               | 1:15-21, 3:5-10, 3:15-23 | References the confidential topics discussed in both deposition transcripts.   |

4. The above listed exchanges reflect (1) confidential internal SIE processes, business strategies, decision-making plans, and strategic decisions made by SIE, and (2) confidential communications regarding SIE contract terms, difficulties with Implicit on SIE intellectual property, and conversations with SIE's third party partners regarding their intellectual property.

5. Specifically, portions of the above listed deposition transcripts contain discussions of confidential and proprietary information about SIE's process of reviewing and hiring vendors

1 to conduct engineering work, including internal metrics and standards used to evaluate and  
2 onboard the vendors which is treated as confidential within SIE. This commercially sensitive  
3 information regarding SIE's internal decision-making process for hiring vendors is not publicly  
4 known and is valuable both to potential vendors and competitors of SIE. If this information is  
5 publicly disclosed, SIE could suffer harm as competitors could use the details of SIE's internal  
6 decision-making processes and specifics of its vendor review process to potentially undercut SIE  
7 in the market and gain a competitive advantage. Further, if vendors obtained this confidential  
8 information, they could gain an advantage in preparing bids to work for SIE or deciding not to  
9 work with SIE at all. In short, SIE keeps its process of selecting vendors—particularly for the  
10 Classics team—confidential to protect the integrity of the project and maintain its competitive  
11 space in the market.

12 6. Additionally, other portions of the above listed deposition transcripts contain  
13 discussions of Implicit's violations of its contracts with SIE, including misuse of SIE's property  
14 including intellectual property. For the same reasons as explained above, SIE considers its  
15 contracts with vendors confidential. The relevant deposition transcript passages relate to how the  
16 contract was violated by Implicit, which third-party partner raised the issue to SIE, and how many  
17 times the issue occurred. SIE treats all conversations had with SIE's partners as confidential for  
18 several reasons. One reason is that SIE values the confidence of its partners as a critical part of an  
19 ongoing relationship; if SIE divulges the content of conversations it had with its partners, those  
20 partners may be less likely to do business with SIE. Further, publicizing Implicit's violations may  
21 embolden other vendors to misuse third-party IP and may alienate other third parties from  
22 partnering with SIE on the emulation project if they fear their IP may be misused by SIE's  
23 vendors.

24 I declare under penalty of perjury under the laws of the United States of America that the  
25 foregoing is true and correct.

26 Dated: August <sup>8/29/2025</sup>\_\_\_\_\_, 2025

*Timothy Lindquist*

Timothy Lindquist